

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

RAYAN BROOKE WOLF and
AARON THOMAS

INDICTMENT

Case No. _____

Violations: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(C), 846, 856(a)(1), and 856(b);
and 18 U.S.C. § 2

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone

The Grand Jury Charges:

Beginning in or about 2018 and continuing until in or about November 2019, in
the District of North Dakota, and elsewhere,

RAYAN BROOKE WOLF and
AARON THOMAS

knowingly and intentionally combined, conspired, confederated, and agreed with others,
both known and unknown to the grand jury, to distribute and possess with intent to
distribute a mixture and substance containing a detectable amount of oxycodone, a
Schedule II controlled substance, in violation of Title 21, United States Code, Sections
841(a)(1) and 841(b)(1)(C).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one
or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and
did distribute, and possess with intent to distribute, pills containing a detectable amount

of oxycodone, a Schedule II controlled substance, in and about New Town and the Fort Berthold Indian Reservation in North Dakota, and elsewhere;

2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;

3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances and collection of drug proceeds; and

5. It was further a part of said conspiracy that the defendants allowed and permitted sources of supply of oxycodone pills to utilize their residence in New Town, North Dakota, to store, conceal, and distribute oxycodone 30mg pills, and to store and conceal the proceeds of drug trafficking conduct;

In violation of Title 21, United States Code, Section 846; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Distribution of Oxycodone

The Grand Jury Further Charges:

Beginning in or about 2018 and continuing until in or about November 2019, in the District of North Dakota, and elsewhere,

RAYAN BROOKE WOLF and
AARON THOMAS,

individually, and by aiding and abetting, knowingly and intentionally distributed a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and Title 18, United States Code, Section 2.

COUNT THREE

Maintaining Drug-Involved Premises

The Grand Jury Further Charges:

Beginning in or about 2018 and continuing until in or about November 2019, in the District of North Dakota, and elsewhere,

RAYAN BROOKE WOLF and
AARON THOMAS,

individually, and by aiding and abetting, knowingly opened, leased, rented, used, and maintained any place, whether permanently or temporarily, for the purpose of distributing and using any controlled substance; specifically, RAYAN BROOKE WOLF and AARON THOMAS opened, used, and maintained a residence in the Riverview Estates subdivision in New Town, North Dakota, for purposes of distributing a mixture and substance containing oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 856(a)(1) and 856(b), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

RLV/sj